

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 20-154 (WMW/TNL)

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	DEFENDANT'S MOTION TO
	)	SUPPRESS EVIDENCE OBTAINED
v.	)	AS A RESULT OF SEARCH AND
	)	SEIZURE
ROBERT LAWRENCE STACE,	)	
	)	
Defendant.	)	

Robert Lawrence Stace, by and through his attorney, respectfully moves the Court pursuant to Rule 12, Federal Rules of Criminal Procedure, to suppress any physical evidence obtained as a result of an illegal seizure that eventually led to a search by warrant.

Discovery indicates that an electronic device (MP3 player) was taken from Mr. Stace. It is unclear who examined the MP3 player without a warrant. On February 27, 2020, after obtaining a state search warrant, Minneapolis Crime Lab examined a hard drive, two MP3 players, two flash devices, and three digital cameras. Some of these items were found inside a backpack located at 57\*\* Olson Memorial High Way in Golden Valley. It is not known from the discovery how the police associated the address and the backpack with Mr. Stace. The hard drive was obtained from Emerge and one of the MP3 players was found on Mr. Stace. Images of Child Pornography were found on one MP3 player (unclear if it is the one from the backpack or the one on Mr. Stace), a hard drive, and a Google account. Mr. Stace argues that the items were originally taken from him illegally

(the MP3 Player) and then searched without a warrant. It is unclear again how the backpack is associated with Mr. Stace.

Dated: September 1, 2020

Respectfully submitted,

*s/Manny K. Atwal*

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